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VIA CM/ECF

Hon. P. Kevin Castel
U.S. District Court for the Southern District of New York
Daniel Patrick Moynihan United States Courthouse
500 Pearl Street
New York, NY 10007

Re: *Red Tree Investments, LLC v. Petróleos de Venezuela, S.A. et al.*,
Nos. 19 Civ. 2519 and 19 Civ. 2523

Dear Judge Castel:

Thank you for your time yesterday.

I would like to follow up on one point regarding scheduling. As I mentioned, my case before Judge Rakoff, *Gruber v. Gilbertson*, No. 16 Civ. 9727, will begin jury selection on February 3, 2022. Should the Court determine that a trial is necessary in this matter, I will be available to try these cases any day in January. While the *Dresser-Rand* case took three days to try, perhaps any issues here could be tried in a day.

Of course, we continue to believe that this matter can be resolved on summary judgment and no trial is necessary.

Respectfully submitted,

/s/ Steven F. Molo
Steven F. Molo

CC: All counsel of record via CM/ECF